

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE,
NUMBER 04-53, ALAN C. TODD.

CASE NUMBER SC04-1655

**THE HONORABLE ALAN C. TODD'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

The Honorable Alan C. Todd, by and through his undersigned attorneys, and pursuant to Rule 1.350, Fla.R.Civ.P., and Rule 12(a), Florida Judicial Qualifications Commission Rules, hereby requests that the Judicial Qualifications Commission produce for inspection, examination and copying at the offices of Muller & Sommerville, P.A., 1150 Louisiana Avenue, Suite 2, Winter Park, Florida 32789, within thirty (30) days, or at such time and place as may be agreed upon between counsel, the originals, or, if the originals are unavailable, copies of all documents hereinafter described in the possession, custody or control of the Judicial Qualifications Commission.

I. DEFINITIONS AND INSTRUCTIONS

1. The term "document" or "documents" mean any and all information in tangible form and shall include, without limiting the generality of the foregoing, all letters, telegrams, telexes, teletypes, correspondence, contracts, drafts, agreements, notes to file, reports, memoranda, mechanical or electronic recordings or transcripts of such recordings, blueprints, flow sheets, calendar or

diary entries, memoranda or telephone or personal conversations, memoranda of meetings or conferences, studies, reports, interoffice and intra-office communications, quotations, offers, inquiries, bulletins, circulars, statements, manuals, summaries, newsletters, compilations, maps, charts, graphs, propositions, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates, promissory notes and other evidence of indebtedness and all drafts and copies of documents as hereinabove defined by whatever means made. If multiple copies of a document exist, each copy which is in any way not completely identical to a copy which is being produced should also be produced.

II. DOCUMENTS TO BE PRODUCED

1. A copy of the Judicial Qualifications Commission hearing held in 1992;
2. Copies of all statements made by any witness the Judicial Qualifications Commission intends to call at a hearing or trial in this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by mail delivery to Lansing C. Scriven, Esq., Florida Judicial Qualifications Commission, 442 W. Kennedy Boulevard, Suite 280, Tampa,

Florida 33606, Thomas C. McDonald, Jr., Esq., General Counsel, Florida Judicial
Qualifications Commission, 1904 S. Holly Lane, Tampa, Florida 33629 this _____
day of January, 2005.

**CHANDLER R. MULLER, of
LAW OFFICES OF
MULLER & SOMMERVILLE, P.A.**
1150 Louisiana Avenue, Suite 2
Post Office Box 2128
Winter Park, Florida 32790-2128
Telephone: (407)647-8200
Facsimile: (407)645-3000
Florida Bar Number 112381